

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

In re:

PAYLESS HOLDINGS LLC et al.,

Debtors

Case No. 19-40883-659  
CHAPTER 11

(Jointly Administered)

X

**VERIFIED MOTION FOR ADMISSION *PRO HAC VICE***

Pursuant to LR 2090(B)(1) of the United States Bankruptcy Court for the Easter District of Missouri, and Rule 12.01(F) of the local rules of the United States District Court for the Eastern District of Missouri, I, **Joaquin J. Alemany**, move for my admission *pro hac vice* to the bar of this Court for the purpose of representing Plaza las Americas, Inc. and Plaza del Caribe, S.E., in the instant matter. In support of this motion I submit the following information as required by Rule 12.01(F):

a. *Full name of the movant-attorney:*

Joaquin J. Alemany

b. *Address and telephone number of the movant-attorney:*

Joaquin J. Alemany, Esq.  
Holland & Knight LLP  
701 Brickell Avenue, Suite 3300  
Miami, FL 33131  
(305) 789-7763

c. *Name of the firm or letterhead under which the movant practices:*

Holland & Knight LLP

d. *Name of the law school(s) movant attended and the date(s) of graduation therefrom:*

University of Miami School of Law - 2003

e. *State and federal bars of which the movant is a member, with dates of admission and registration numbers, if any:*

Florida Bar No. 662380 (2003)

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Supreme Court of the State of Florida (2003); United States District Court for the Southern District of Florida (2004).

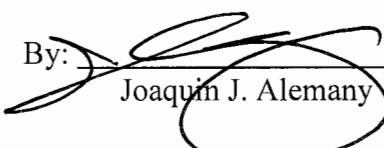
- f. *Statement that movant is a member in good standing of all bars of which movant is a member and that movant is not under suspension or disbarment from any bar;*

Mr. Alemany affirms that he is a member in good standing of all the bars set forth above and is not currently under suspension or disbarment from any bar.

- g. *Statement that movant does not reside in the Eastern District of Missouri, is not regularly employed in this District, and is not regularly engaged in the practice of law in this District.*

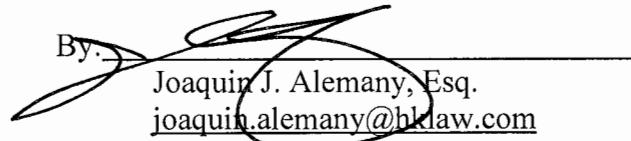
Mr. Alemany affirms that he does not reside in the Eastern District of Missouri, is not regularly employed in this District and is not regularly engaged in the practice of law in this District.

Mr. Alemany attests under penalty of perjury to the truth and accuracy of the foregoing facts and respectfully requests that this motion be granted and that he be admitted *pro hac vice* to the bar of this Court and be allowed to appear in the instant matter.

By:   
Joaquin J. Alemany

Respectfully submitted

HOLLAND & KNIGHT LLP  
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By:   
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Attorneys for Plaza la Americas, Inc.,  
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